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July 18, 2022

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANTS TO ANSWER**

BY ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED

SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 07/19/22

Plaintiff is directed to seek default judgment on or before August 18, 2022, or otherwise risk dismissal pursuant to Federal Rule of Civil Procedure 41(b).

**Re: Ramon Martinez Ramos v. Amazing Deal of Grand, Inc., et. al.
Case Number: SDNY 22 Civ. 4746 (VSB)**

Dear Judge Broderick:

We are counsel to plaintiff Ramon Martinez Ramos in the above-referenced law suit. The court has noted that defendants' time to respond to the complaint has lapsed. [Docket 7]

We write with reference to the District Court's order that plaintiff file a motion for default judgment by July 22, 2022 [Docket 7].

We respectfully seek a one (1) month extension of this deadline. The plaintiff has received multiple intimidating calls and messages from the individual defendant apparently seeking to resolve the case directly with our client and we asked the defendant to stop communicating with the plaintiff. We will send the court's order to the defendant with this letter indicating that we will seek to recover costs and expenses in the event the defendants willfully default and later wish to vacate it.

In the interest in resolving the case on its merits, we respectfully ask the court to give the defendants one (1) month to retain counsel and respond to the complaint. Failing to respond, plaintiff will promptly request the clerk of court note the individual and corporate defendants' default and take all necessary steps to enter judgement in this matter, against all defendants.

No other deadlines will be affected, and this is our first request for such extension.

Hon. Vernon S. Broderick, U.S.D.J.

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Thank you for your consideration of this case.

Sincerely,

/s/ Peter H. Cooper

Peter H. Cooper

cc: Jian Ren Chen
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2256 Grand Concourse
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